

1 A. Yes.

2 Q. Do you know of any public announcement  
3 about that potential in 2010? Are you aware of any?

4 A. Well, certainly not from us, and whether  
5 or not Essex County had announced their discussions  
6 with ICE, that's certainly possible.

7 Q. Okay. But as you sit here today, you're  
8 not sure?

9 A. No.

10 MR. O'CONNOR: Now, the next exhibit  
11 will be 53.

12 (Exhibit Clancy-53, E-mail string Bates  
13 No. CEC--0121633-0121634 was received and marked for  
14 identification.)

15 (Witness reviews document.)

16 Q. Clancy-53 is November 7, '09 e-mail from  
17 you to Miss Mathios, and she was asking for a review  
18 of background information to be used in the offering  
19 memorandum?

20 A. Right.

21 Q. Okay. And with respect to Mr.  
22 Palatucci, it said in the offering memorandum he was  
23 a member and ultimately a partner at Dughi, Hewit &  
24 Palatucci serving in lobbying and general counsel  
25 capabilities (sic) thereafter.

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1                   And then you had asked her to consider  
2 focusing on Bill's government service and lobbying  
3 efforts and the fact that he had just been named  
4 chairman of the inaugural festivities for  
5 Governor-elect Christie?

6           A.       Yes.

7           Q.       And to suggest that Christie was his  
8 former law partner?

9           A.       I don't see that.

10          Q.       Well, look at the last sentence, "for  
11 Governor-elect Christie, his former law partner."

12          A.       Correct.

13          Q.       Was he, in fact, Mr. Palatucci's former  
14 law partner?

15          A.       Yes.

16          Q.       And so you wanted to play that up?

17                   MS. WOOD: Object to the form.

18          A.       Well, again, I think it's suggesting  
19 that there was something missing.

20          Q.       Well, you wanted to use it; right?

21                   MS. WOOD: Object to form.

22          A.       I wanted her to include it.

23          Q.       Yeah. And that's something you wanted  
24 the potential investors to know, that you had a guy  
25 on the inside that knew the incoming governor;

1 correct?

2 MS. WOOD: Objection to form.

3 A. Yeah, I think that's an  
4 over-characterization of it.

5 Q. Well, why else would you want to add it,  
6 sir?

7 A. Because I think he would be proud of  
8 that.

9 Q. Oh, okay. Isn't it true that throughout  
10 2010 you discussed with upper management at CEC the  
11 potential contract with Essex County and the  
12 revenues, and how you could use that to negotiate the  
13 best refinancing deal possible?

14 A. Again, Essex County, we had an existing  
15 contract with Essex County that we have had, I --  
16 tonight I will be, you know, hopefully at a  
17 freeholder meeting where they will approve a new  
18 five-year contract. So we're at the absolute last  
19 end of that.

20 So we were in the fourth year of a  
21 five-year contract, one of a hundred contracts, and  
22 we would have been discussing, I would think,  
23 anything -- any of them that would have perceived by  
24 me to be relevant, or others to be perceived as  
25 relevant or important.